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November 12, 2024

**VIA ECF**

The Honorable Thomas I. Vanaskie  
Special Master for Discovery  
Stevens & Lee  
1818 Market Street, 29th Floor  
Philadelphia, PA 19103

Re: *In re Valsartan, Losartan, and Irbesartan Liability Litigation*,  
Case No. 1:19-md-02875-RMB (D.N.J.)

Dear Special Master Vanaskie:

In accordance with Your Honor's direction at the October 29, 2024 status conference, I write to inform you that the ZHP Defendants and the Plaintiffs have met and conferred regarding the proposed case management schedule for the *Roberts* case, which is set for trial on September 8, 2025. The parties have reached agreement on all pre-trial deadlines, with the exception of the time period allotted for depositions of the parties' expert witnesses.

The ZHP Defendants believe that they should be entitled to depose some or all of plaintiffs' experts prior to the submission of the ZHP Defendants' responsive expert reports, while Plaintiffs contend that the ZHP Defendants should not be allowed to depose Plaintiffs' experts until after the submission of the ZHP Defendants' expert reports. The parties jointly request permission to submit short letter briefs on this issue by November 19, 2024 at 5 p.m. (ET).

Thank you for your consideration of this request.

November 12, 2024

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Respectfully,

A handwritten signature in black ink, appearing to read "Nina Rose", written in a cursive style.

Nina R. Rose

cc: All counsel of record (via ECF)